

**MSC Variation Request**

# **NORWAY GREENLAND HALIBUT**

Marine Stewardship Council fisheries assessments

22.11.2021

# 1 Introduction

This form details the information required from Conformity Assessment Bodies (CABs) to enable the MSC to consider a CAB application to vary from a clause or requirement in any of the MSC program documents (GCR 4.12).

Please complete all unshaded fields. Where instructions are included in italics, please delete and replace with your specific information. All grey boxes containing instructions may be deleted, e.g. the 'Introduction' section.

Once this variation form is completed, delete guidance, save it as a PDF file and upload to the MSC database. On receipt, the MSC will consider your request and will usually respond within 14 days.

Please note that all variation request forms and MSC responses to the request will be published on the MSC website along with other assessment documents associated with the specific fishery.

## 2 Marine Stewardship Council variation request

**Table 1 – Variation request**

1	Date submitted to the MSC
	- Please note the MSC will usually respond within 14 days, but for complex variations, longer may be necessary. The MSC will keep you informed if it will take longer than 14 days.
	22 <sup>nd</sup> November 2021
2	CAB
	DNV Business Assurance
3	Fishery name and certificate number
	Norway Greenland halibut
4	Lead auditor or program manager
	Lucia Revenga
5	Request prepared by
	Lucia Revenga
6	Scheme requirement(s) for which variation requested
	<p>MSC FCP v2.2 7.16.1 The team shall carry out the site visit as planned</p> <p>Derogation 3: Covid-19 Fishery and Chain of Custody Remote Auditing (<a href="https://www.msc.org/docs/default-source/default-document-library/for-business/program-documents/chain-of-custody-supporting-documents/msc-derogation-3-covid-19-fishery-and-chain-of-custody-remote-auditing.pdf">https://www.msc.org/docs/default-source/default-document-library/for-business/program-documents/chain-of-custody-supporting-documents/msc-derogation-3-covid-19-fishery-and-chain-of-custody-remote-auditing.pdf</a>) Normative Requirements - 1.3.b. – Submit a variation request (as per GCR 4.12) to the MSC to conduct initial assessments remotely.</p>
7	How many times has a variation for this requirement been accepted for the same assessment of the same fishery?
	- e.g. Fill in 2 <sup>nd</sup> if a previous extension request on the 60 days requirement for surveillance reports has been accepted, and this request is for an additional time extension on top of that.
	None.

**Table 2 – Variation justification**

1	Proposed variation	
	<ul style="list-style-type: none"> <li>Please describe how the CAB proposes to vary from the requirement including, where required, any original deadline date, the length of additional time requested and the exact modified deadline date.</li> </ul>	
	<p>To conduct initial audit as an off-site initial audit.</p> <p>The CAB proposes that the site visit for this fishery be conducted remotely for the assessment team, as opposed to conducting a fully onsite visit to Norway. Note that Principle experts for P2 and P3 have already participated in the assessment of several other Norwegian MSC certified fisheries for the same client (NFA), including on-site meetings in the past with relevant stakeholders. P1 expert has participated in the full assessment of the same stock in the same fishing grounds for a different client.</p>	
2	Additional time requested	
	Original deadline date	7 <sup>th</sup> , 8 <sup>th</sup> , 9 <sup>th</sup> , 10 <sup>th</sup> and 11 <sup>th</sup> February 2022
	Modified deadline date requested	N/A
	Length of additional time requested	N/A
3	Justification	
	<ul style="list-style-type: none"> <li>Please explain in detail why the variation is requested and why the change is necessary. This helps the MSC decide whether the variation request should be granted.</li> </ul>	
	<p>The updated MSC Covid-19 Pandemic Derogation (effective 28th March 2021) states that “initial assessments and audits that are to be completed without an on-site visit will require CABs to submit a variation request and risk assessment for approval” and that “If national or local Covid-19 restrictions prevent Conformity Assessment Bodies (CABs), assessors or certificate holders from carrying out on-site audits and assessments of already certified businesses, these may be undertaken remotely.”</p> <p>The justification for conducting a remote site visit for this assessment is as follows:</p> <p>Travel Restrictions: The fishery is carried out by Norwegian vessels in the Norwegian and Barents Sea. Site visits would require a trip to Norway.</p> <ul style="list-style-type: none"> <li>In relation to restrictions to Norway, these are specified in <a href="https://www.visitnorway.com/plan-your-trip/coronavirus-and-travelling-to-norway/">https://www.visitnorway.com/plan-your-trip/coronavirus-and-travelling-to-norway/</a> and <a href="https://www.fhi.no/en/op/novel-coronavirus-facts-advice/facts-and-general-advice/entry-quarantine-travel-covid19/">https://www.fhi.no/en/op/novel-coronavirus-facts-advice/facts-and-general-advice/entry-quarantine-travel-covid19/</a></li> </ul> <p>Note that travels restrictions depend on the country from which assessors travel and also on that country's situation over time in relation to the pandemic.</p> <p>Several European countries are at present entering lockdown and it is uncertain how it will be the situation in February 2023. Holding on site visits may heavily increase the cost of this, as there is the chance that stays need to be extended in case of quarantine mandate.</p>	
4	Implications for assessment	
	<ul style="list-style-type: none"> <li>Please include any impacts on the assessment/certificate if the request is accepted referencing any other requirements which may be affected, and the risks these implications could have.</li> <li>e.g. Timeline delays, stakeholder input.</li> </ul>	
	<p>Remote audit activities should not have any implications for the assessment, including its timeline. Note that Principle 2 and Principle 3 experts have already participated in onsite audits for the same client, while Principle 1 expert has participated in the Initial assessment of the same stock for a different client.</p>	

	<p>All assessors already have good information on the regulations that apply to the fishery and on the potential impacts to expect as well as on stakeholders that should be contacted.</p> <p>Taking into account our CAB's experience with remote fishery assessments within the derogation period during which the active participation of the stakeholders was provided, there is confidence that high level of stakeholder interaction will be provided here as well and the team will be able to collect all required information.</p>
5	Mitigation of the implications for assessment
	<ul style="list-style-type: none"> <li>Please include information how risks of the implications for the assessment that have been identified under the previous question are proposed to be mitigated by the CAB.</li> </ul>
	See Table 1 Risk assessment
6	How many conditions does the fishery have and will their progress be affected (positive or negative)?
	N/A (ACDR stage)
7	What is the status of the current assessment or audit?
	<ul style="list-style-type: none"> <li>Please include the latest version and timing of the report that has been prepared, and an indication when the next report is expected (e.g. the Client and Peer Review Draft Report has been sent to the client and the peer reviewers on 7 June 2018. The Public Comment Draft Report is expected to be ready on 1 September 2018).</li> </ul>
	Initial audit is scheduled for week commencing 7 <sup>th</sup> February 2022.
8	Further comments
	<ul style="list-style-type: none"> <li>Please include any further relevant information.</li> </ul>
	Client NFA (Norwegian Fishermen Association) is a long-time fishing industry engaged in MSC certifications, with first MSC assessments dating back over 10 years from now. There are more than 10 MSC certificates belonging to this client. Client and relevant stakeholders are well familiarised with the MSC assessment system.
9	If applicable, additional information added after the MSC's request

Table 1: Areas of risk to be included in risk assessment

Risks areas	Key risks	Fishery risk
Sufficient information to enable an effective and robust fishery assessment process and comprehensive assessment against the MSC Fisheries Standard.	Ability to verify information remotely  – please refer to Table G1 for more information	Low risk:  The team will use different mechanisms to engage with the clients remotely and stakeholders, such as Microsoft Teams/ Skype/Zoom calls, email and phone (where appropriate). The mechanisms are determined to be sufficient and effective in the circumstances of this fishery. Fishery reports and other documents are fully available to the team as they have been requested during the ACDR preparation.
	Ability to engage with stakeholders, deliver a robust stakeholder consultation process and conduct interviews with stakeholder. Please refer to FCP 4.2, GFCP 4.2, and 7.16.	Low risk: DNV will organize the consultation process according to FCP v.2.2 4.2. Essential stakeholders such as the client, management authorities and research institutes have confirmed availability to meet remotely in previous assessments. The assessment team is open to set more meetings with other interested stakeholders.
	Ability to gather information and carry out stakeholder consultations if the Risk Based Framework (annex PF) is being used to assess data-deficient PIs. Please refer to PF2.3, PF3.2, PF3.3.2, PF4.1.5.b.ii, PF4.2, PF7.2, PF8.2, PF8.4.1, PF8.5.1, PF8.6.1 and PF8.7.1. Other relevant references: FCP 7.10.2.m.	Low risk, N/A: The use of RBF is not expected.
	Availability of information - FCP 7.10.2.h requires CABs to indicate the availability of information used to score each PI and to highlight potential information gaps. If the CAB identifies a large number of information gaps in the ACDR the CAB should consider if a remote site visit will be sufficient to obtain the necessary information.  Please refer to the interpretation 'Clarifications relating to the Announcement Comment Draft' which provides the MSC's intent behind draft scoring ranges, identification of information gaps to inform site visits and stakeholders consultation: "The MSC's intent is that the ACDR provides indicative scoring and rationales and identifies where more information is needed. One	Low risk: The limited number of information gaps (all of which refer to update information rather than to search for new information) favours the collection of this information via remote means.

	<p>of the objectives of the ACDR is to assist the site visit by facilitating stakeholder input to the assessment prior to the site visit, and to ensure the CAB, the client and stakeholders are better informed and prepared for the site visit...”</p> <p>CABs should consider the risk of an off-site initial fishery assessment if any Performance Indicator has a draft scoring range of &lt;60 reported in the ACDR.</p>	
	<p>Ability to understand the context, scale, and intensity of the fishery operations.</p>	<p>Low risk: the team has a good understanding of the specified aspects of the fishery under assessment. P1, P2 and P3 experts have participated in previous annual surveillances of other fisheries for NFA (The Norwegian Fishermen Association).</p>
Sufficient communication capability to effectively plan, conduct interviews and facilitate information sharing as per IAF MD 4: 20181.	<p>Availability of information and communication technology (ICT). Competency of assessment teams, auditees, and stakeholders in using ICT. Please refer to IAF MD 4:2018</p>	<p>Low risk: the team has available a wide range of ICT such as their PCs with required software, teleconference facilities allowing audio, video and data (ICT) sharing.</p> <p>Video and audio during the opening and closing meetings can be recorded if agreed by all parties, taking into account security and confidentiality issues.</p>
	<p>Ability to clearly exchange information between the assessment team, prospective fishery client and stakeholders and to be understood by all parties when parties speak different languages.</p>	<p>Low risk: the team, representatives of the CAB and the client have used Microsoft Teams and other ITC communication means previously, including during remote assessments. No problems with using them have been identified in the past.</p> <p>The CAB and the assessors understand the risks and opportunities of ICT used and its possible impact on the assessment duration.</p> <p>The language to be used during the assessment will be English.</p> <p>The client is Norwegian and fishery takes place Norwegian fishing grounds. Among team members there is a Norwegian native speaker.</p>
	<p>Ability to schedule remote site visit activities at reasonable mutually convenient times when parties are located across different time zones</p>	<p>Low risk:</p> <p>Assessors and CAB follow CET while client. Meetings will be scheduled at reasonable times for all stakeholders.</p>

### 3 Template information and copyright

This document was drafted using the 'MSC Variation Request Form – Fisheries v1.0'.

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#### Template version control

Version	Date of publication	Description of amendment
1.0	25 March 2020	Release alongside Fisheries Certification Process v2.2

A controlled document list of MSC program documents is available on the MSC website ([msc.org](https://www.msc.org)).

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